

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SELENA STALEY, VIVIAN HOLMES, and OLIVE
IVEY, on behalf of themselves and all others similarly
situated,

Plaintiffs,

-against-

FOUR SEASONS HOTELS AND RESORTS,
HOTEL 57 SERVICES, LLC, HOTEL 57 LLC, TY
WARNER HOTELS & RESORTS, LLC, and H TY
WARNER,

Defendants.
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DECLARATION OF
VIVIAN HOLMES

22-CV-6781 (JSR)

I, Vivian Holmes, pursuant to 28 U.S.C. § 1746, state and declare as follows:

1. I am one of the named Plaintiffs in this action.
2. I have reviewed the EmPact Agreement annexed to the Declaration of Cathy Hwang, and I was never given that EmPact Agreement by any of the Defendants.
3. I have reviewed the EmPact Agreement annexed to the Declaration of Evan Brustein, dated December 5, 2022, and that is the true and accurate copy of the EmPact Agreement Last Revised February 2018 that I acknowledged receiving in 2018.
4. The EmPact Agreement I signed in 2018, had a Welcome Letter on Page 6 signed by Mehdi Eftekari, the Four Seasons Hotel New York General Manager in February 2018, not his successor Rudy Tauscher.
5. I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: December 5, 2022

By: 

Plaintiff Vivian Holmes

